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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Bonnie Prober (the “Applicant”) hereby moves the Court to enter an order
permitting her to participate in this case *Pro Hac Vice* as counsel for Plaintiffs

1 Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule 83.2(c). In
2 support of this Motion, the Applicant states as follows:

3 1. The Applicant is an associate in the law firm of Cuneo Gilbert &
4 LaDuca, LLP, in Bethesda, Maryland.

5 2. The Applicant is a member in good standing of the bars of several
6 United States federal courts, the highest state court of New York, and the District
7 of Columbia.
8

9 3. The Applicant does not reside in the State of Washington and does
10 not maintain an office in the State of Washington.
11

12 4. The Applicant responds to the information requested in Local Rule
13 83.2(c)(2) as follows:
14

15 (a) The Applicant’s address and telephone number are 8120
16 Woodmont Avenue, Suite 810, Bethesda, Maryland, 20814; telephone
17 (202) 789-3960; facsimile (202) 789-1813; email: bprober@cuneolaw.com.
18

19 (b) The dates of admission to practice before other courts are
20 listed below:
21

<u>State Bar Admissions</u>	<u>Date Admitted</u>
New York	2004
District of Columbia	June 11, 2007

1 (c) The name, address and telephone number of admitted counsel
2 with whom the Applicant will be associated are: Beth E. Terrell and Erika L.
3 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite
4 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206)
5 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.
6
7

8 (d) The Applicant's appearance is necessary because Plaintiffs in
9 this action have retained her in this action.
10

11 (e) There are no disciplinary sanction actions pending against the
12 Applicant and the Applicant has never been subject to any disciplinary sanctions
13 by any court or Bar Association.
14

15 5. The Applicant understands that if she is admitted *Pro Hac Vice* she
16 will be subject to the disciplinary jurisdiction of this Court.
17

18 6. The Applicant is familiar with the facts, issues and documents
19 associated with this case.

20 7. The Applicant is familiar with the local rules of this Court.

21 WHEREFORE, Bonnie Prober respectfully requests that the Court enter an
22 order in the form proposed granting the admission *Pro Hac Vice* of Bonnie Prober
23 during the pendency of this case.
24
25
26

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3
4 Dated: 12/17/2013


Bonnie Prober, Applicant

STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Jennifer Rust Murray, Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Bonnie Prober is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 17th day of December, 2013.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on December 17, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Email: mmunson@tcplaw.com

1 DATED this 17th day of December, 2013.

2 TERRELL MARSHALL DAUDT
3 & WILLIE PLLC

4
5 By: /s/ Beth E. Terrell, WSBA #26759

6 Beth E. Terrell, WSBA #26759

7 Attorneys for the Plaintiff

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